UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS BEAUMONT DIVISION

Peter Harris and Loni Harris,

Plaintiffs,

Case No. 1:24-cv-00313

v.

Upwintrade, et al.,

Motion to Withdraw Letter of Request

Defendants.

Plaintiffs Peter and Loni Harris respectfully move this Court for an order withdrawing their previously transmitted Letter of Request to the judicial authority of Singapore.

I. Background

On February 4, 2025, Plaintiffs filed a Motion for Issuance of Letters of Request [Dkt. 24] (the "Request") seeking the issuance of a letter of request directed to the Singaporean judiciary. This purpose of the Request was to obtain evidence related to this matter believed to be in the possession of the Bybit cryptocurrency exchange, which was at one time headquartered in Singapore.

After the transmission of the Request, Plaintiffs were made aware that Bybit's headquarters had moved from Singapore to the United Arab Emirates. This obviated the need for the Request. Plaintiffs responded to the Singaporean authorities notifying them that they intended to withdraw their request in this Court. The Singaporean authorities subsequently responded to Plaintiffs' counsel indicating that the matter had been closed.¹

II. Relief Sought

Plaintiffs respectfully request that the Court enter an order granting withdrawal of the previously transmitted Letter of Request in substantially the form of the proposed order submitted along with this Motion. Plaintiffs' counsel regret the oversight concerning the location of the Bybit exchange.

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¹ Ex. 1, Letter Response from Singaporean Authorities.

Dated: June 11, 2025 Respectfully submitted,

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